

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JOHN AND JANE DOE NO. 1,	:	CASE NO. 3:22-cv-00337
et al.,	:	
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL	:	
DISTRICT BOARD OF	:	
EDUCATION, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF STUDENT WITNESS NO. 1

I, Student Witness No. 1, declare:

1. My name is Student Witness No. 1.
2. I am 15 years old and a tenth grade student at Bethel Local Schools.
3. I have personal knowledge of all of the facts stated in this declaration, and my statements in this declaration are true and accurate to the best of my knowledge, information, and belief.
4. I am a girl.
5. I am a practicing Muslim.
6. I practice the faith, wear a hijab, and protect my modesty from being exposed to men outside of my family.

7. At this time, I am not a plaintiff in the current lawsuit.

8. Around lunch time on January 12, 2023, I went to the girls' communal restroom by the cafeteria at the high school.

9. When I was in the restroom, I saw two pairs of feet in one of the bathroom stalls. The pairs of feet were facing each other.

10. I subsequently saw Anne Roe leaving the bathroom stall.

11. There were several upset girls in the restroom including several Muslim girls.

12. They told me that a transgender student was in the stall with a female student engaging in sexual activity.

13. I was very upset.

14. I do not believe it is right to make us share a communal restroom with a biological male.

15. I did not know Anne Roe prior to the incident but I knew the face. After the incident I looked at an old school yearbook and confirmed that is who I specifically saw coming out of the bathroom stall.

16. I know many girls, and many Muslim girls, who try to avoid using the restroom if at all possible.

17. After the incident, I told Principal Swope that I was not comfortable using the restroom with a biological boy and that all of my Muslim friends were not ok with it either.

18. Principal Swope only said "OK." He did not respond in a way that made me think he would do anything about the situation.

19. Principal Swope also did not tell me anything about my ability to use another restroom. Nor has anyone at school ever suggested I do that.

I declare under penalty of perjury that the foregoing is true and correct.

Feb 03, 2023
Date

Student Witness NO. 1
Student Witness No. 1